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7 Attorneys for Phillip Christensen, as Receiver

8 **UNITED STATES DISTRICT COURT**

9 **EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION**

11 METROPOLITAN LIFE INSURANCE  
COMPANY, a New York corporation,

12 Plaintiff,

13 vs.

14 ACDF, LLC, a California limited liability  
15 company, et al.,

16 Defendants.

Lead Case No. 1:24-cv-01261-KES-SAB

Consolidated with Case Nos:  
1:24-cv-01226; 1:24-cv-01230; 1:24-cv-  
01231; 1:24-cv-01232; 1:24-cv-01233; 1:24-  
cv-01235; and 1:24-cv-01241

**SUPPLEMENTAL DECLARATION OF  
ZEV SHECHTMAN IN RESPONSE TO  
MINUTE ORDER DATED MARCH 6,  
2025**

Hearing:

Date: March 17, 2025

Time: 1:30 p.m.

Place: Robert E. Coyle U.S. Courthouse  
2500 Tulare Street  
Courtroom 6, 7th Floor  
Fresno, CA 93721

- 17 ☒ Affects All Cases  
18 ☐ Affects Metropolitan Life Ins. Co. v.  
19 ACDF, LLC, et al., 1:24-cv-01261  
20 ☐ Affects Metropolitan Life Ins. Co. v.  
21 FNF Farms, LLC, et al., 1:24-cv-01226  
22 ☐ Affects Metropolitan Life Ins. Co. v. C  
23 & A Farms, LLC, et al., 1:24-cv-01230  
24 ☐ Affects Metropolitan Life Ins. Co. v.  
25 Maricopa Orchards, LLC, et al., 1:24-  
26 cv-01231  
27 ☐ Affects Brighthouse Life Ins. Co. v.  
Kamm South, LLC, et al., 1:24-cv-  
01232  
28 ☐ Affects Brighthouse Life Ins. Co. v.  
Manning Avenue Pistachios, LLC, et  
al., 1:24-cv-01233 Case No. 1:24-cv-  
01233

- ☐ Affects Brighthouse Life Ins. Co. v. ACDF, LLC, et al., 1:24-cv-01235
- ☐ Affects MetLife Real Estate Lending, LLC v. Panoche Pistachios, LLC, et al., 1:24-cv-01241

I, Zev Shechtman, declare and state as follows:

1. I am a partner of Saul Ewing, LLP (the “Firm”), counsel for Phillip Christensen, as Receiver in this matter. I am duly admitted to practice in the State of California and before the above-entitled Court.

2. I have personal knowledge of all of the facts in this declaration and, if called as a witness, could competently testify to these facts.

3. On March 6, 2025, the Court issued a minute order continuing the hearing for approval of the sales procedures motion and requesting that the Receiver file, by no later than March 10, 2025, a declaration confirming whether all entities with known liens, claims, encumbrances, or other interests on the subject properties, as that term is defined in the motion for approval of sale procedures, have been served with the sales procedures motion.

4. I and my paralegal thereafter reviewed and analyzed preliminary title reports for each of the real properties of the above referenced Receivership estates to identify all parties in interest and any lien, easement or other rights holders listed on the preliminary title reports. The preliminary title reports reviewed were all prepared between August and December of 2024.

5. To the extent available, my staff obtained addresses for each of the potential interest holders listed on the title reports by reviewing the source documents and/or conducting internet searches for those addresses.

6. However, several of the recorded documents described in title reports were very old (some over 100 years old). In those cases, the addresses of the potential lienholders were unavailable and/or not readily accessible.

7. I have caused a supplemental notice to be served on all such parties except those for whom we could not find addresses.

1           8. Attached to the contemporaneously filed supplemental notice are the supplemental  
2 service lists—one for each of the eight above-captioned Receivership Cases—generated in this  
3 process.

4  
5 DATED: March 10, 2025

SAUL EWING LLP

6  
7 By:



8 ZEV SHECHTMAN

9 Attorneys for Phillip Christensen, as Receiver  
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**PROOF OF SERVICE OF DOCUMENT**

I am over the age of 18 and not a party to this case. My business address is: **Saul Ewing 1888 Century Park East, Suite 1500, Los Angeles, CA 90067.**

A true and correct copy of the document entitled: **Supplemental Declaration of Zev Shechtman in Response to Minute Order Dated March 6, 2025** will be served or was served on the judge in chambers in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING**

**(NEF):** The foregoing document will be served by the court via NEF and hyperlink to the document. On **March 10, 2025**, I checked the CM/ECF docket for this case and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On **March 10, 2025**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed

☒ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served):**

Pursuant to F.R.Civ.P. 5 on **March 10, 2025**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

March 10, 2025	Hannah Richmond	/s/ Hannah Richmond
<i>Date</i>	<i>Printed Name</i>	<i>Signature</i>

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):**

- **Mark Anishchenko**  
markanishchenko@dwt.com,rosalindcook@dwt.com
- **Robert Cullen Barton**  
rbarton@mwe.com,acorona@mwe.com,mnadel@mwe.com
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**2. SERVED BY UNITED STATES MAIL (continued):**

John A. Bezmalinovic, General Counsel	Fay Pugh
Katrina Ingrao	Law Offices of Saul Reiss, P.C.
The Assemi Group	11835 W. Olympic Blvd., Suite 415E
5260 N. Palm Ave., Suite 421	Los Angeles, Ca 90064
Fresno, CA 93704	
Ashlan & Hayes Investments, LLC	Grantor Fresno Clovis Investments, LLC
c/o Agent for Service of Process	c/o Agent for Service of Process
John A. Bezmalinovic, General Counsel	John A. Bezmalinovic, General Counsel
The Assemi Group	The Assemi Group
5260 N. Palm Ave., Suite 421	5260 N. Palm Ave., Suite 421
Fresno, CA 93704	Fresno, CA 93704
Dirk B. Paloutzian	
Natalya M. Ferdinandi	
Baker Manock & Jensen, PC	
5260 North Palm Avenue, Suite 201	
Fresno, California 93704	

1 **3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE**  
2 **TRANSMISSION OR EMAIL (continued) :**

3 **VIA EMAIL:**

- 4 • JBezmalinovic@assemigroup.com
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